From: Weaver, Crystal, EMNRD

To: "Baker, Larry"; Bratcher, Mike, EMNRD; "stucker@blm.gov"

Subject: RE: Barnsdall Federal 2RP-4202

Date: Wednesday, March 14, 2018 9:43:00 AM

RE: Apache \* Barnsdall Federal Tank Battery \* 30-015-42364 \* 2RP-4202

Hello Bruce,

I have looked over the attached lab data and compared it to the data table that is incorporated onto the site map and the two do not match up. It appears that side wall and bottom samples that are mentioned in the table only cite the DRO values of TPH and not total TPH values. The site ranking for this project was a score of 10 meaning that total TPH levels (GRO DRO and MRO) have to add up to be below 1000ppm. That has not been achieved at N2 side wall, N3 side wall if I go in and add up the TPH values myself from the attached lab data, and for the chloride levels as well on N1 side wall, N2 side wall, and N3 side wall those need to be values of 600ppm or less based on lab data results. Since Apache has expressed the need to maintain a 1ft gap between the excavation and the side wall of the secondary containment, I am assuming that at this time Apache will not be able to clean up the rest of the Northern area of the release. If that is correct and Apache can think of no way to remediate that last portion at this time, then Apache will need to send a request for deferment for that area and be specific on why and what parts Apache is needing deferred.

Thank you,

## **Crystal Weaver**

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**From:** Baker, Larry [mailto:Larry.Baker@apachecorp.com]

Sent: Thursday, January 18, 2018 9:34 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD

<Crystal.Weaver@state.nm.us>; 'stucker@blm.gov' <stucker@blm.gov>

**Subject:** Barnsdall Federal 2RP-4202

Attached is the lab analysis and sample plat for the four foot excavation. The excavation along the north wall was stopped approximately 1 foot from the lined facility wall to preserve the integrity of the liner. Upon your review of the data Apache respectfully request permission to install a 20 mil liner at 4 feet below ground surface and proceed with backfilling the excavation in accordance with the approved corrective action plan. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

## **BRUCE BAKER**

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